

1 DAVID R. ZARO (BAR NO. 124334)  
TED FATES (BAR NO. 227809)  
2 TIM C. HSU (BAR NO. 279208)  
ALLEN MATKINS LECK GAMBLE  
3 MALLORY & NATSIS LLP  
515 South Figueroa Street, Ninth Floor  
4 Los Angeles, California 90071-3309  
Phone: (213) 622-5555  
5 Fax: (213) 620-8816  
E-Mail: dzaro@allenmatkins.com  
6 tfates@allenmatkins.com  
thsu@allenmatkins.com

7 Attorneys for Plaintiff  
8 WILLIAM J. HOFFMAN, Receiver

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **WESTERN DIVISION**

12 WILLIAM J. HOFFMAN, Court-  
appointed permanent receiver for  
13 Nationwide Automated Systems, Inc.,  
Oasis Studio Rentals, LLC, Oasis Studio  
14 Rentals #2, LLC, Oasis Studio  
Rentals #3, LLC, and their subsidiaries  
15 and affiliates,

16 Plaintiff,

17 v.

18 JEFFREY FIRESTONE, an individual;  
and WANTANA FIRESTONE, an  
19 individual,

20 Defendants.

Case No. 2:15-cv-8486-SJO-FFM

REQUEST FOR ENTRY OF DEFAULT  
OF DEFENDANTS JEFFREY  
FIRESTONE AND WANTANA  
FIRESTONE

Judge: Hon. S. James Otero

1 **TO THE CLERK OF THE ABOVE-ENTITLED COURT:**

2 Plaintiff William J. Hoffman of Trigild, Inc. ("Receiver"), the Court-  
3 appointed permanent receiver for Nationwide Automated Systems, Inc. ("NASI"),  
4 Oasis Studio Rentals, LLC, Oasis Studio Rentals #2, LLC, Oasis Studio  
5 Rentals #3, LLC, and their subsidiaries and affiliates (collectively with NASI,  
6 "Receivership Entities"), by and through counsel, hereby requests that the clerk of  
7 the above-entitled Court enter default in this matter against Defendants Jeffrey  
8 Firestone and Wantana Firestone ("Defaulting Defendants") on the ground that the  
9 Defaulting Defendants have failed to appear or otherwise respond to the properly  
10 served Complaint within the time prescribed by the Federal Rules of Civil  
11 Procedure.

12 On October 30, 2015, the Receiver filed the Complaint in the above-entitled  
13 action. Copies of the Complaint and Summons issued by the Court were then  
14 personally served on Defaulting Defendants on November 3, 2015. (Dkt. Nos. 11,  
15 12.) Accordingly, pursuant to the Federal Rules of Civil Procedure, Defaulting  
16 Defendants' responses were due by November 24, 2015. *See* Fed. R. Civ. Proc.  
17 Rule 4(e)(1), 12(a)(1)(A).

18 On November 4, 2015, the Receiver's counsel conferred with Jeffrey  
19 Firestone by phone and email to discuss the matter and reminded him that a  
20 response to the Complaint must be timely filed and served. Subsequently, on  
21 November 17, 2015 and November 23, 2015 (prior to the deadline for Defaulting  
22 Defendants to respond), the Receiver's counsel sent additional emails to Jeffrey  
23 Firestone again reminding him of the deadline to file a responsive pleading. After  
24 having received no responses to the emails, and after the deadline to file a  
25 responsive pleading had passed, on November 25, 2015, the Receiver's counsel sent,  
26 by way of FedEx and email, a letter to Defaulting Defendants informing them of the  
27 Receiver's intent to take their defaults and subsequently seek entry of judgment  
28 thereon. Notwithstanding proper service of the Summons and Complaint, and the

1 Receiver's counsel's various emails and letters, as of the date of this filing,  
2 Defaulting Defendants have not filed any responsive pleading or motion, or  
3 otherwise made any appearance in this action.

4 Accordingly, the Receiver hereby respectfully requests that defaults be  
5 immediately entered as against Defaulting Defendants Jeffrey Firestone and  
6 Wantana Firestone.

7  
8 Dated: December 1, 2015

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
DAVID R. ZARO  
TED FATES  
TIM C. HSU

9  
10  
11 By: /s/ Tim C. Hsu

12 TIM C. HSU  
13 Attorneys for Receiver  
14 WILLIAM J. HOFFMAN  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28